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2/15/95UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: February 15, 1995

SUBJECT: Albion-Sheridan Landfill Remedial Alternative Selection

FROM: Judy Kleiman, RCRA/CERCLA Liaison

TO: Leah Evison, RPM

The Selected Remedial Alternative for the Albion-Sheridan Township Landfill in Albion, Michigan has been reviewed by RCRA for ARARs. Documents previously reviewed stated that several drums at this site contained hazardous waste, but no applicable RCRA waste codes have been provided. Sludges from electroplating operations which were disposed of here may have been listed wastes F006 or F008, but more specific information on the origin and nature of the sludges is needed. No listed waste codes have been associated with the liquid wastes or volatile constituents. For the preferred alternatives, RCRA ARARs are relevant and appropriate where high concentrations of chromium, lead or nickel occur and for liquid waste which is hazardous by characteristic.

Alternative 2: Removal and Off Site Disposal of Drums

Drummed sludges which are high in chromium, nickel or lead are assumed to be RCRA listed waste F006 or F008 and must be treated to meet LDR treatment standards before land disposal. After treatment, stabilized F006/F008 sludge must be disposed of only in a Subtitle C landfill. Drummed wastes which are characteristic must be treated to meet treatment standards. After treatment these wastes may be placed in a Subtitle D landfill. Drums which are not intact may pose a risk if allowed to remain in the landfill if the waste contains high concentrations of hazardous constituents, regardless of whether the waste meets the definitions for RCRA listed or characteristic waste.

Alternative 3C: Flexible Membrane Liner Cap

If the sludges with high concentration of heavy metals were removed in 1980, then a cover designed for a solid waste landfill as described in Alternative 3C would be in compliance RCRA. If electroplating sludges evidenced by high concentrations of heavy metals remain in the landfill, then a RCRA cap is relevant and appropriate.

Alternative 4B: Collection and Flaring of Landfill Gas

There are no RCRA ARARs for collection and flaring of landfill gas.

Alternative 5A: Ground Water Monitoring and Natural Removal of Arsenic.

Since the arsenic at this site has not been attributed to any RCRA waste, there are no RCRA ARARs for the arsenic plume.

If I can be of further assistance in this matter, please contact me at 6-1482.

cc: Karl Bremer